

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

RICHARD MA and FRED DEVEREAUX,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

MAPFRE U.S.A. CORP. and THE COMMERCE  
INSURANCE COMPANY,

Defendants.

Case No. 1:23-cv-12059

**ASSENTED TO MOTION TO ADMIT COUNSEL  
PRO HAC VICE (NICHOLAS A. MIGLIACCIO)**

Pursuant to Local Rule 85.5.3, of the United States District Court for the District of Massachusetts, the undersigned counsel, Patrick J. Sheehan, herby moves the Court to enter an Order granting leave to Nicholas A. Migliaccio to appear on behalf of the plaintiffs, Richard Ma and Fred Devereaux, and practice before this Court in the above-entitled civil action.

As grounds for this motion, the undersigned represents the following:

1. Nicholas A. Migliaccio is a member in good standing of the bars of the District of Columbia and the State of New York. He has also been admitted in other federal jurisdictions as set forth in his accompanying Certification.
2. There are no disciplinary proceedings against Nicholas A. Migliaccio as a member of the bar of any jurisdiction.
3. Nicholas A. Migliaccio has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts and that he agrees to comply with the same.

4. Nicholas A. Migliaccio has not previously had a pro hac vice admission to this Court or other admission for a limited purpose under this rule revoked for misconduct.

5. Nicholas A. Migliaccio has submitted herewith his Certification for Admission Pro Hac Vice as required by Local Rule.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)

Undersigned counsel certifies that counsel for Plaintiffs have conferred with counsel for the defendants in a good faith effort to resolve or narrow the issues raised by this motion with the following result: counsel for the defendants indicated that the defendants assent to the relief sought by this motion.

Dated: September 22, 2023.

Respectfully submitted

/s/ Patrick J. Sheehan  
Patrick J. Sheehan (BBO# 639320)  
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Boston, Massachusetts 02110  
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 22, 2023.

/s/ Patrick J. Sheehan

Patrick J. Sheehan